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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RAYMOND G. SCHREIBER REVOCABLE
TRUST and ROBERT SCHREIBER, an
individual residing in Ohio,

) Case No.: 2:05-cv-0574-LDG-PAL

Plaintiffs,

) **MOTION FOR RELEASE OF FILM**
)) **AND TAPE**

VS.

THE ESTATE OF ROBERT C. KNIEVEL a/k/a
EVEL KNIEVEL; KELLY KNIEVEL, an
individual residing in Nevada; K AND K
PROMOTIONS, INC., a Nevada Corporation;
and CONANT INVESTMENT COMPANY,
LLC, a Nevada Limited Liability Company.

Defendants

Defendants, THE ESTATE OF ROBERT C. KNIEVEL a/k/a EVEL KNIEVEL,
KELLY KNIEVEL, K AND K PROMOTIONS, INC., and CONANT INVESTMENT
COMPANY, LLC (together “Defendants”), by and through their attorneys, Borghese Legal,
Ltd., hereby move that the Film and Tape currently being held at the Iron Mountain Storage
Facility be released to K and K Promotions, Inc. (“K&K”).

MEMORANDUM OF POINTS AND AUTHORITIES

On or about September 17, 2009, this Court ordered that (i) approximately 118 reels of film contained within approximately 102 reel canisters and (ii) three Betacam tapes (“Film and Tape”) be placed at the following location: Iron Mountain, 2942 Brooks Park Drive, North Las Vegas, 89030 (“Storage Facility”) (*See* Docket #209).

The Court further ordered that none of the Film and Tape be removed from the Storage

1 Facility without an order from this Court or stipulation by the parties.

2 On November 1, 2013 this Court entered a final judgment in this case ("Judgment") (See
3 Docket #233). One of the rulings in the Judgment is that K&K be granted equal access to the
4 Film and Tape (See Judgment at 1(d)).

5 It is requested that this Court enter an order allowing K&K Promotions, Inc. to
6 remove the Film and Tape from the Storage Facility. This will avoid additional fees and costs
7 incurred from the Storage Facility charges and fulfill the equal access granted to K&K in the
8 Judgment. It is anticipated that after K&K has temporary possession of the Film and Tape the
9 parties will be able to work out a reasonable system of equal access to the Film and Tape.

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11 DATED this 7th day of November, 2013.

12 Respectf

13 fully Submitted,

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15 **BORGHESE LEGAL, LTD.**

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21 SO ORDERED.

22 DATED this 27th day of November, 2013.

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25 Lloyd D. George
26 Sr. U.S.District Judge
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